

**Federal Defenders
OF NEW YORK, INC.**

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MEMO ENDORSED

Southern District of New York
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December 16, 2021

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By Email and ECF

The Honorable Valerie E. Caproni
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Joakim von Ditmar, 18 Cr. 863 (VEC)*

Honorable Judge Caproni:

With the consent of the Government, I write to respectfully request that the date for Mr. Von Ditmar's voluntary surrender be extended for 60 days to Thursday, February 24, 2022. We make this request because, as we have previously informed the Court, [REDACTED]

[REDACTED] Your Honor previously granted a 60-day extension on September 23, 2021.

Prior to that date in September, and again on November 19, 2021 we contacted the Office of the Regional Counsel for the Bureau of Prisons and requested that [REDACTED]. Following that communication, we understood that the location of Mr. Von Ditmar's designation was under consideration. As of today, have not received a communication from the BOP indicating where Mr. Von Ditmar has been designated.

This afternoon, however, we heard from United States Pretrial Services Officer Francesca Piperato that the BOP had contacted her this morning inquiring as to why Mr. Von Ditmar had not surrendered. It is not clear whether our November request to the BOP is still under consideration, or where, if anywhere, the BOP has designated Mr. Von Ditmar to serve his sentence.

I have discussed this request with United States Pretrial Officer Francesca Piperato, who confirms that Mr. Von Ditmar is in compliance with the terms of his pretrial release. Additionally, [REDACTED]

[REDACTED] I have discussed this matter with Assistant United States Attorney Tara LaMorte who consents to the requested extension on behalf of the United States..

Thank you for your consideration of this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'CFlood', with a stylized flourish at the end.

Christopher A. Flood

cc: AUSA's Tara LaMorte (*by ECF*)
USPTO Francesca Piperato

Application GRANTED.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Valerie Caproni', with a date '12/16/21' written to the right of the signature.

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE